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May 31, 2022

Via ECF

Hon. Paul G. Gardephe United States District Court Judge Thurgood Marshall United States Courthouse 40 Foley Square New York, New York 10007

Re: Primed Pharmaceuticals LLC v. Starr Indemnity & Liability Company

21 Civ. 1025 (PGG)

Dear Judge Gardephe:

This firm represents Plaintiff Primed Pharmaceuticals LLC in the above referenced insurance coverage litigation. We write this letter jointly with counsel for Defendant Starr Indemnity & Liability Company to request a one-week extension of the time for the parties to submit a pre-motion letter to the Court in accordance with Docket No. 63.

In the Court's Order (Dkt. 63), the pre-motion letter is due June 1, 2022. Accordingly, the parties jointly request an extension until June 8, 2022. No previous requests for an extension of this date have been requested or granted. Good cause exists for this request since counsel for the parties have recently spoken and discussed some matters that we believe have the potential to make the summary judgment process in this case more efficient for both the parties and the Court, however, they need some additional time to discuss these ideas with their clients. This request is jointly made. Finally, if approved this extension would necessitate the extension of the response date from June 8th to June 15th.

Respectfully submitted,

STERN & SCHURIN LLP Richard S. Schurin

Richard S. Schurin

MEMO ENDORSED

The Application is granted.

SO ORDERED:

Paul G. Gardephe, U/S D.I.

Dated: June 1, 2022

cc: All C

All Counsel (via ECF)